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**Cc:** [Casey\\_Luckett/R6/USEPA/US@EPA](mailto:Casey_Luckett/R6/USEPA/US@EPA); [Carlos\\_Sanchez/R6/USEPA/US@EPA](mailto:Carlos_Sanchez/R6/USEPA/US@EPA); [Donald\\_Williams/R6/USEPA/US@EPA](mailto:Donald_Williams/R6/USEPA/US@EPA); [grish.org](http://grish.org)  
**Subject:** Arkwood Inc. Superfund Site: Pentachlorophenol Risk Scientific Expertise Requested for November 9, 2011, Meeting at EPA Region 6  
**Date:** 10/28/2011 12:36 PM  
**Attachments:** [Third Five Year Review.pdf](#)  
[FINALGrishamJrConcernsReDraft3rd5yearReview.pdf](#)  
[FINAL3rd5yearReviewInterviewForm.pdf](#)  
[Arkwood\\_2009\\_Annual\\_Report.pdf](#)  
[Arkwood\\_2009\\_Annual\\_Report\\_Cover.pdf](#)

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Nader Elkassabany, PhD  
Branch Chief  
Risk Assessment & Science Support Branch (RASSB)  
Antimicrobials Division  
United States Environmental Protection Agency  
1200 Pennsylvania Avenue NW  
Washington D.C. 20460

RE: ARKWOOD, INC. SUPERFUND SITE  
EPA ID: ARD084930148  
Site ID: 0600124

Dear Mr. Elkassabany,

Thank you for returning my call today; I found our conversation very enlightening. Here is the contact information for the organizer of the meeting on November 9th:

Casey Luckett Snyder  
Remedial Project Manager/  
Region 6 Superfund Reuse Coordinator  
(214) 665-7393  
[luckett.casey@epa.gov](mailto:luckett.casey@epa.gov)

Please contact Ms. Luckett-Snyder at EPA Region 6 to be added to the agenda for November 9th along with anyone else you care to include from your division who has scientific expertise on the toxicity of pentachlorophenol, its risk to human health and, very importantly, its risk to aquatic life in the environment. Ms. Luckett-Snyder can provide you with the finalized agenda when it is completed at Region 6.

I attach here the Third Five-Year Review for the Arkwood Superfund site, along with my formal concerns regarding the draft of that document, which concerns were submitted months before the review's finalization and publication. I also attach the only annual report I have been provided for Arkwood (2009).

Please note that I have questioned the quality and accuracy of the data and analysis contained in the attached Third Five-Year Review and 2009 Annual Report, their supporting monthly analytical reports and individual test results, as well as other scientific work performed for Arkwood, all of which have been used to support the conclusions, assumptions and recommendations for the Arkwood site, past and present.

All of these data and analyses were gathered, analyzed, tabulated and reported by

PRP McKesson Corporation and its contractors. **None** of the science around the water quality at offsite New Cricket Spring (the only area allegedly still contaminated beyond acceptable standards) was performed by either EPA or Arkansas Department of Environmental Quality.

Rather, the scientific work performed by McKesson and its contractors was cut and pasted into EPA's official documentation with no independent verification of these data or the testing methodologies underlying them. Notably missing: controlling for pH in pH-dependent formulae, including the lack of provision for a neutral collection vessel for the water samples. There were also significant time lags between collection and delivery to the laboratories in another state, which would allow for both changes in pH and concentration of the water samples via evaporation.

If you would care to see any of the individual test reports, other Annual Reports or any other reporting from McKesson on the Arkwood site, please contact Tammie J. Hynum at Arkansas Department of Environmental Quality. Her contact information:

Tammie J. Hynum  
Technical Branch Manager  
Hazardous Waste Division  
Arkansas Department of Environmental Quality  
(501) 682-0856  
[hynum@adeq.state.ar.us](mailto:hynum@adeq.state.ar.us)

I look forward to your participation in the November 9th meeting beginning at 10:00 AM Central Time at Region 6 in Dallas; I believe the input you and your colleagues can provide from a perspective of hard science will be extremely valuable to attaining a rational conclusion to this issue, particularly in light of the **Reregistration Eligibility Decision for Pentachlorophenol** (EPA 739-R-08-008, September 25, 2008) and its vast supporting research.

Sincerely,

Curt Grisham  
415-264-7400  
[curt@grish.org](mailto:curt@grish.org)

cc: Casey Luckett-Snyder  
Carlos Sanchez  
Donald Williams